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DOC #:
DATE FILED: 10/31/11

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re HERALD, PRIMEO and THEMA
FUNDS SECURITIES LITIGATION

This Document Relates To:

*Repex Ventures, S.A. v.
Bernard L. Madoff, et al.*

Case No. 09 CIV 289 (RMB)(HBP)

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ECF CASE

**NOTICE OF WITHDRAWAL AS
COUNSEL OF RECORD [AND PROPOSED ORDER]**

PLEASE TAKE NOTICE that Patryk J. Chudy is hereby withdrawn as counsel of record for defendant Ernst & Young S.A. ("EY Luxembourg") in the above-captioned action. Mr. Chudy is leaving Orrick Herrington & Sutcliffe LLP and has accepted a position in government service. Orrick Herrington & Sutcliffe LLP will continue to act as counsel for EY Luxembourg.

Dated: October 28, 2011
New York, New York

Respectfully submitted,


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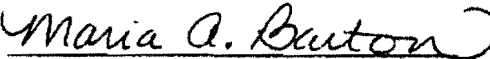
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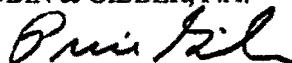
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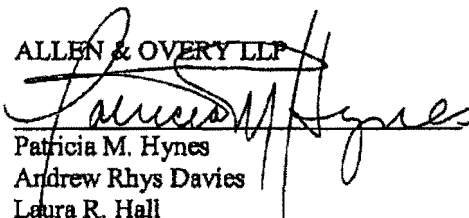
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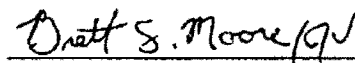
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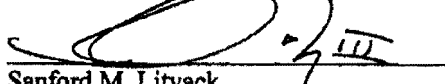
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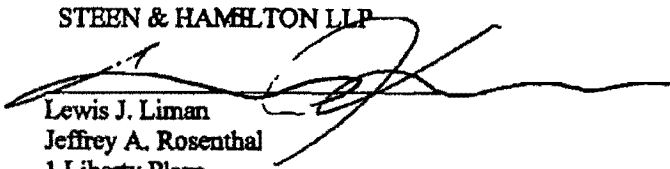
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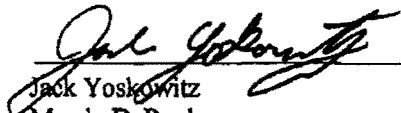
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